

Message Text

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TO USMISSION IAEA VIENNA PRIORITY

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E.A. 11652: N/A

TAGS: TECH, IAEA, SENV

SUBJECT: IAEA'S PANEL OF EXPERTS' REPORT ON OCEAN DUMPING

REF: (A) STATE A-9894; (B) IAEA VIENNA 10184; (C) IAEA

VIENNA 10383; (D) IAEA VIENNA 08987; (E) IAEA

VIENNA 10215

1. MISSION MAY FORMALLY TRANSMIT TO AGENCY ALL U.S.
SUGGESTIONS ON SUBJECT REPORT AS INITIALLY PROVIDED IN
REFAIR A, AS REVISED BY REFTEL B, AND SUBJECT TO FOL-
LOWING ADDITIONAL COMMENTS, WHICH REFER TO NUMBERED PARAS
REFTEL B.

PARA 7 - PARA 3 REFTEL D (OCTOBER 31, 1973) NOTED AGENCY

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CONSIDERING CHANGING PHRASE ON LINE 2, PAGE 8 GOV/1622TT

TO READ "E.G.
, AT DEPTHS OVER 2,000 METERS." WE ENDORSE
THIS CONSIDERATION AND SUGGEST RELEVANT PHRASE LINE 10
FIRST PARA, PAGE 8, SECTION 2.1 BE FURTHER REVISED TO
READ, "...LIMITING CAPACITY OF A SECTOR OF THE MARINE
ENVIRONMENT, DEFINED AS THE ANNUAL INPUT OF RADIOACTIVITY
WHICH WILL RESULT IN INDIVIDUAL DOSE COMMITMENT VIA...".
WE DO NOT FIND PHRASE "LIMITING ENVIRONMENTAL CAPACITY"
SPECIFICALLY EQUATED WITH "DEEP SEA" IN EITHER THE
NRPB-R14 OR NEA DOCUMENTS.

PARA 8 - WE REITERATE OUR CONCERN OVER CONTINUED INCLUSION
SECOND FULL PARAGRAPH BEGINNING WITH THE WORDS, "THE
WIDE RANGE".
SINCE AGREEMENT REACHED IN PARA 6 REFTEL B TO CHANGE
WORKING GOV/1622 SECTION 1.3, OBJECTIVE 2, TO RESTRICT
RECOMMENDATIONS TO DEEP OCEAN DISPOSAL OF SOLID WASTES,
RELEVANT PARAGRAPH IS GRATUITOUS AND NEEDLESSLY IMPLIES
NO FURTHER PROGRESS CAN BE EXPECTED IN WAY OF ADDITIONAL
GUIDANCE IN THIS AREA. AGAIN WE EMPHASIZE THAT THIS
PARAGRAPH CONTRIBUTES VERY LITTLE TOWARDS PROVIDING
POSITIVE BASIS FOR DEFINITION "HIGH-LEVEL RADIOACTIVE
WASTE OR OTHER HIGH LEVEL RADIOACTIVE MATTER UNSUITABLE
FOR DUMPING AT SEA", AND TENDS WEAKEN DOCUMENT BY BEING
INCONCLUSIVE.

PARA 9 - WE SUGGEST POINT OF CLARIFICATION FOR MIXED FISSION
PRODUCTS CATEGORY TO READ "AGED MIXED FISSION PRODUCTS" IN
RELEVANT PLACES PARA 9 REFTEL B. THIS WOULD PERMIT
IMMEDIATE DIFFERENTIATION BETWEEN MIXED FISSION PRODUCTS
AND BETA-GAMMA EMITTERS. WE ALSO SUGGEST UNITS FOR PROPOSED
FIRST TWO ENTRIES IN TABLE AT BOTTOM PAGE 9 GOV/1622 BE
CHANGED TO CI/TONNE INSTEAD OF CI/YEAR. WE CONCUR WITH
SUGGESTION INCLUDING DEFINITION OF "AGED MIXED FISSION
PRODUCTS" AND HOPE IT INCLUDES INFORMATION CONTAINED IN
NRPB-R14, PAGE 19, END OF FIRST PARAGRAPH.
WITH REFERENCE LAST SENTENCE PARA 9 REFTEL B, THE
NRPB-R14 DOCUMENT PAGE 19, AND NEA DOCUMENT PAGE 19,
ADDRESS FIVE CLASSES OF WASTE. ALPHA WASTE (BASED ON
226 RA) NOT MENTIONED IN GOV/1622. WE CONCUR WITH COMMENT
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OF FEDERAL REPUBLIC OF GERMANY IN REFTEL E TO INCLUDE
A CATEGORY OF ALPHA WASTE CONTAINING 226 RA. WE SUGGEST
THIS WASTE CATEGORY BE INCLUDED IN APPROPRIATE TEXT AND
TABLES ON PAGES 8-10 GOV/1622.

PARA 10 PROPOSALS OF REFTEL B ACCEPTABLE AND IT IS OUR
UNDERSTANDING THAT SECTION 2.1 PAGE 9 OF GOV/1622, FIRST
FULL PARAGRAPH, WILL CONTAIN FOLLOWING REVISED LANGUAGE:

QUOTE IF THE ABOVE ANNUAL DISPOSAL LIMITS PER DUMP SITE ARE NOT EXCEEDED, THERE WILL BE NO LARGE SCALE EFFECT ON BIOLOGICAL ORGANISMS. ANY ADVERSE EFFECTS WOULD ONLY BE EVIDENCED IN A FEW INDIVIDUAL ORGANISMS IN THE VICINITY OF THE DISPERSAL AREA. UNQUOTE.

PARA 12 - FIRST SENTENCE OF FIRST FULL PARAGRAPH PAGE 10 OF GOV/1622 IS CONCISE. SECOND SENTENCE THIS PARAGRAPH DOES NOT PROVIDE CLARIFICATION OF FIRST SENTENCE, BUT COULD PROVIDE CONFUSION WITHIN NEXT DECADE. IT IS CONCEIVABLE THAT RADIOACTIVE WASTE GENERATED WILL RISE SHARPLY SUCH THAT ACTIVITY CONCENTRATION FOR, E.G., 1, 25, OR 50 TONNES MIGHT EXCEED ACTIVITY CONCENTRATION LIMITS BUT IF AVERAGED OVER 100 TONNES THIS WOULD RESULT IN ACTIVITY CONCENTRATIONS BELOW BUT CLOSE TO LIMITS. IF SUCH WERE CASE THEN TOTAL ACTIVITY DUMPED ANNUALLY WOULD INDEED BE CONSIDERABLE AND NOT NECESSARILY "FAR BELOW THE STIPULATED ANNUAL LIMITS".

PARA 15 - THE NATURE OUR SUGGESTION UNDER SUB-PARAGRAPH 4, SECTION 3.1, REPEAT SECTION 3.1 (NOT SECTION 4 PER REFTEL B) THE ENVIRONMENTAL REVIEW, REFLECTS A REQUIREMENT TO SUBSTANTIATE THE "MOST LIKELY PROCESS" IN TABLE 6, P. 22 AND P. 23 OF THE NEA AND NRPB-R15 DOCUMENTS RESPECTIVELY, NAMELY:

"DRUMS RETAIN EVEN HIGHLY SOLUBLE WASTE (TRITIUM) FOR MONTHS OR YEARS. DRUMS RETAIN OTHER SOLUBLE WASTES FOR TENS OF HUNDREDS OF YEARS AND MUCH OF THE INSOLUBLE WASTE IS NEVER RELEASED."

WE DO NOT NECESSARILY URGE THAT RELEVANT STATEMENT BE APPENDED TO SUB-PARAGRAPH 4, SECTION 3.1. HOWEVER, SINCE CONTAINER AND MATRIX MATERIALS AND CHARACTERISTICS UNCLASSIFIED

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VARY, WE FEEL THAT NEED FOR SUCH SPECIFIC ASSUMPTIONS OR DATA RELATIVE TO RADIONUCLIDE MOBILIZATION SHOULD BE INCLUDED IN GOV/1622 EITHER UNDER SECTION 3 OR SECTION 4; FOR EXAMPLE, AS A MODIFICATION OF FIRST SENTENCE IN SECOND PARAGRAPH SECTION 4.1 P. 13.

RE INCLUSION OF ASSUMPTIONS AND DATA IN IMPACT STATEMENT, WE BELIEVE THAT ASSUMPTIONS ON WHICH CONCLUSIONS BASED SHOULD BE SET FORTH IN SAME DOCUMENT CONTAINING THESE CONCLUSIONS.

PARA 17 - WITH INCORPORATION OF NEW ITEM (E) IN SECTION 3.2 IN AS NOTED PARA 16 REFTEL B, IT WOULD PROBABLY BE BETTER COMPLETELY DELETE PHRASE "ENVIRONMENTAL MONITORING TO FULFILL THE ABOVE FUNCTIONS IS RECOMMENDED."

PARA 21 - IN TRANSMITTING U.S. COMMENTS TO AGENCY, MISSION
MAY EMPHASIZE THAT U.S. WOULD NOT WANT SEE APPROVAL OF
RECOMMENDATIONS DELAYED BY CONVENING OF PANEL SOLELY TO
CONSIDER QUESTION OF "MORE DESCRIPTIVE DEFINITION OF
HIGH-LEVEL RADIOACTIVE WASTES." IN VIEW, HOWEVER, FACT
MEMBER STATES HAVE HAD ADDITIONAL TIME SINCE JUNE 1973
PANEL TO FURTHER CONSIDER PANEL RECOMMENDATIONS, AND SINCE
CONSULTANT'S AND PANEL MEETING SARE BEING CONTEMPLATED FOR
FURTHER REFINEMENT OF RECOMMENDATIONS, U.S. CONTINUES
BELIEVE, FOR REASONS SET FORTH REFAIRGRAM A, THAT QUESTION
MORE DESCRIPTIVE DEFINITION SHOULD NEVERTHELESS BE
CON-SIDERED BY AGENCY FOR INCLUSION IN RECOMMENDATIONS.
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